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Attorneys for Plaintiff
UNITED STATES OF AMERICA

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

NEAL PATEL,
aka "@INTERNETLORD,"
aka "@DEFEAT,"

Defendant.

No. CR 19-00017-CJC

PLEA AGREEMENT FOR DEFENDANT
NEAL PATEL

1. This constitutes the plea agreement between NEAL PATEL ("defendant") and the United States Attorney's Office for the Central District of California (the "USAO") in the above-captioned case. This agreement is limited to the USAO and cannot bind any other federal, state, local, or foreign prosecuting, enforcement, administrative, or regulatory authorities.

DEFENDANT'S OBLIGATIONS

2. Defendant agrees to:
a. At the earliest opportunity requested by the USAO and provided by the Court, appear and plead guilty to counts one through

1 five of the indictment in United States v. NEAL PATEL, CR No. 19-
2 00017-CJC, which charge defendant with conspiracy, in violation of 18
3 U.S.C. § 371; conveying false information concerning the use of an
4 explosive device, in violation of 18 U.S.C. § 844(e); conspiracy to
5 commit bank fraud, in violation of 18 U.S.C. § 1349; and bank fraud,
6 in violation of 18 U.S.C. § 1344.

7 b. Not contest facts agreed to in this agreement.

8 c. Abide by all agreements regarding sentencing contained
9 in this agreement.

10 d. Appear for all court appearances, surrender as ordered
11 for service of sentence, obey all conditions of any bond, and obey
12 any other ongoing court order in this matter.

13 e. Not commit any crime; however, offenses that would be
14 excluded for sentencing purposes under United States Sentencing
15 Guidelines ("U.S.S.G." or "Sentencing Guidelines") § 4A1.2(c) are not
16 within the scope of this agreement.

17 f. Be truthful at all times with the United States
18 Probation and Pretrial Services Office and the Court.

19 g. Pay the applicable special assessments at or before
20 the time of sentencing unless defendant lacks the ability to pay and
21 prior to sentencing submits a completed financial statement on a form
22 to be provided by the USAO.

23 h. Make restitution at or before the time of sentencing,
24 and not seek the discharge of any restitution obligation, in whole or
25 in part, in any present or future bankruptcy proceeding.

26 THE USAO'S OBLIGATIONS

27 3. The USAO agrees to:

28 a. Not contest facts agreed to in this agreement.

1 b. Abide by all agreements regarding sentencing contained
2 in this agreement.

3 c. At the time of sentencing, provided that defendant
4 demonstrates an acceptance of responsibility for the offenses up to
5 and including the time of sentencing, recommend a two-level reduction
6 in the applicable Sentencing Guidelines offense level, pursuant to
7 U.S.S.G. § 3E1.1, and recommend and, if necessary, move for an
8 additional one-level reduction if available under that section.

9 d. Recommend that defendant be sentenced to a three-year
10 term of probation and 300 hours of community service to include, at
11 the discretion of defendant's Probation Officer, an audio and video
12 recorded presentation made by defendant at a school or comparable
13 public forum about the deleterious consequences of engaging in
14 swatting, i.e., making a false report to law enforcement or emergency
15 services with the intent to cause a law enforcement response.

16 NATURE OF THE OFFENSES

17 4. Defendant understands that for defendant to be guilty of
18 the crime charged in count one, that is, conspiracy, in violation of
19 Title 18, United States Code, Section 371, the following must be
20 true: first, beginning on or about December 7, 2017, and ending on or
21 about December 10, 2017, there was an agreement between two or more
22 persons to commit at least one crime as charged in the indictment;
23 second, the defendant became a member of the conspiracy knowing of at
24 least one of its objects and intending to help accomplish it; and
25 third, one of the members of the conspiracy performed at least one
26 overt act on or after December 7, 2017 for the purpose of carrying
27 out the conspiracy.
28

1 5. Defendant understands that for defendant to be guilty of
2 the crime charged in counts two and three, that is, conveying false
3 information concerning the use of an explosive device, in violation
4 of Title 18, United States Code, Section 844(e), the following must
5 be true: Defendant (1) willfully; (2) made a threat or conveyed false
6 information about an attempt; (3) by mail, telephone, telegraph, or
7 other instrument of interstate or foreign commerce; (4) to kill,
8 injure, or intimidate an individual or damage or destroy property;
9 (5) by means of fire or an explosive.

10 6. Defendant understands that for defendant to be guilty of
11 the crime charged in count four, that is, conspiracy to commit bank
12 fraud, in violation of Title 18, United States Code, Section 1349,
13 the following must be true: first, beginning on or about November 27,
14 2017, and ending on or about December 5, 2017, there was an agreement
15 between two or more persons to commit bank fraud in violation of
16 Title 18, United States Code, Section 1344; and second, the defendant
17 became a member of the conspiracy knowing of at least one of its
18 objects and intending to help accomplish it.

19 7. Defendant understands that for defendant to be guilty of
20 the crime charged in count five, that is, bank fraud, in violation of
21 Title 18, United States Code, Section 1344(2), the following must be
22 true: first, the defendant knowingly carried out a scheme or plan to
23 obtain money or property from a financial institution - namely,
24 Waukesha State Bank - by making false statements or promises; second,
25 the defendant knew that the statements or promises were false; third,
26 the statements or promises were material - that is, they had a
27 natural tendency to influence, or were capable of influencing, a
28 financial institution to part with money or property; fourth, the

1 defendant acted with the intent to defraud; and fifth, Waukesha State
2 Bank was federally insured.

3 PENALTIES AND RESTITUTION

4 8. Defendant understands that the statutory maximum sentence
5 that the Court can impose for a violation of Title 18, United States
6 Code, Section 371, is: 5 years' imprisonment; a 3-year period of
7 supervised release; a fine of \$250,000 or twice the gross gain or
8 gross loss resulting from the offense, whichever is greatest; and a
9 mandatory special assessment of \$100.

10 9. Defendant understands that the statutory maximum sentence
11 that the Court can impose for each violation of Title 18, United
12 States Code, Section 844(e), is: 10 years' imprisonment; a 3-year
13 period of supervised release; a fine of \$250,000 or twice the gross
14 gain or gross loss resulting from the offense, whichever is greatest;
15 and a mandatory special assessment of \$100.

16 10. Defendant understands that the statutory maximum sentence
17 that the Court can impose for a violation of Title 18, United States
18 Code, Section 1349, is: 30 years' imprisonment; a 3-year period of
19 supervised release; a fine of not more than \$1,000,000; and a
20 mandatory special assessment of \$100.

21 11. Defendant understands that the statutory maximum sentence
22 that the Court can impose for a violation of Title 18, United States
23 Code, Section 1344, is: 30 years' imprisonment; a 3-year period of
24 supervised release; a fine of not more than \$1,000,000; and a
25 mandatory special assessment of \$100.

26 12. Defendant understands, therefore, that the total maximum
27 sentence for all offenses to which defendant is pleading guilty is:
28 85 years' imprisonment; a 3-year period of supervised release; a fine

1 of \$2,750,000 or twice the gross gain or gross loss resulting from
2 the offenses, whichever is greatest; and a mandatory special
3 assessment of \$500.

4 13. Defendant understands that defendant will be required to
5 pay full restitution to the victims of the offenses to which
6 defendant is pleading guilty. Defendant agrees that, in return for
7 the USAO's compliance with its obligations under this agreement, the
8 Court may order restitution to persons other than the victims of the
9 offenses to which defendant is pleading guilty and in amounts greater
10 than those alleged in the counts to which defendant is pleading
11 guilty. In particular, defendant agrees that the Court may order
12 restitution to any victim of any of the following for any losses
13 suffered by that victim as a result: any relevant conduct, as defined
14 in U.S.S.G. § 1B1.3, in connection with the offenses to which
15 defendant is pleading guilty. The parties currently believe that the
16 applicable amount of restitution is approximately \$33,708.12, but
17 recognize and agree that this amount could change based on facts that
18 come to the attention of the parties prior to sentencing.

19 14. Defendant understands that supervised release is a period
20 of time following imprisonment during which defendant will be subject
21 to various restrictions and requirements. Defendant understands that
22 if defendant violates one or more of the conditions of any supervised
23 release imposed, defendant may be returned to prison for all or part
24 of the term of supervised release authorized by statute for the
25 offense that resulted in the term of supervised release, which could
26 result in defendant serving a total term of imprisonment greater than
27 the statutory maximum stated above.

1 15. Defendant understands that, by pleading guilty, defendant
2 may be giving up valuable government benefits and valuable civic
3 rights, such as the right to vote, the right to possess a firearm,
4 the right to hold office, and the right to serve on a jury.
5 Defendant understands that once the Court accepts defendant's guilty
6 plea, it will be a federal felony for defendant to possess a firearm
7 or ammunition. Defendant understands that the conviction in this
8 case may also subject defendant to various other collateral
9 consequences, including but not limited to revocation of probation,
10 parole, or supervised release in another case and suspension or
11 revocation of a professional license. Defendant understands that
12 unanticipated collateral consequences will not serve as grounds to
13 withdraw defendant's guilty plea.

14 16. Defendant understands that, if defendant is not a United
15 States citizen, the felony conviction in this case may subject
16 defendant to: removal, also known as deportation, which may, under
17 some circumstances, be mandatory; denial of citizenship; and denial
18 of admission to the United States in the future. The court cannot,
19 and defendant's attorney also may not be able to, advise defendant
20 fully regarding the immigration consequences of the felony conviction
21 in this case. Defendant understands that unexpected immigration
22 consequences will not serve as grounds to withdraw defendant's guilty
23 plea.

24 FACTUAL BASIS

25 17. Defendant admits that defendant is, in fact, guilty of the
26 offenses to which defendant is agreeing to plead guilty. Defendant
27 and the USAO agree to the statement of facts provided below and agree
28 that this statement of facts is sufficient to support pleas of guilty

1 to the charges described in this agreement and to establish the
2 Sentencing Guidelines factors set forth in paragraph 19 below but is
3 not meant to be a complete recitation of all facts relevant to the
4 underlying criminal conduct or all facts known to either party that
5 relate to that conduct.

6 No later than December 7, 2017, and continuing through
7 on or about December 10, 2017, defendant agreed to, and did
8 in fact, by a telephone and instrument of interstate and
9 foreign commerce, willfully make a threat, and maliciously
10 convey false information knowing the information to be
11 false, concerning an alleged attempt being made, or to be
made, to kill, injure, and intimidate an individual and to
damage and destroy property by means of fire and an
explosive. In furtherance of this conspiracy, defendant
committed, and caused others to commit, the following overt
acts:

12 On December 7, 2017, in Twitter direct messages,
13 defendant asked Unindicted Co-Conspirator No. 1 to swat
14 Victim R.S., and Unindicted Co-Conspirator No. 1 agreed.
15 On that same date, in Twitter direct messages, defendant
16 provided Unindicted Co-Conspirator No. 1 with what he
believed to be personal identification information for
Victim R.S., including Victim R.S.'s home address in
Milford, Connecticut.

17 Later that day, Unindicted Co-Conspirator No. 1 called
18 the Milford Police Department, identified himself as Victim
19 R.S., and provided what he believed to be the home address
20 of Victim R.S. Unindicted Co-Conspirator No. 1, posing as
Victim R.S., also falsely reported that he had shot his
parents, that he had tied up his siblings and intended to
kill them, and that he planned to burn down his house.

21 On December 8, 2017, in Twitter direct messages,
22 Unindicted Co-Conspirator No. 1 told defendant that he had
23 swatted Victim R.S. Later that day, in Twitter direct
24 messages, defendant provided Unindicted Co-Conspirator No.
25 1 with what he believed to be the address for a convention
26 center in Dallas, Texas (the "Convention Center"), where a
27 video game tournament was then occurring. Defendant then
28 agreed to create, and did in fact create, an account with a
voice-over-internet services provider for Unindicted Co-
Conspirator No. 1 to use in making hoax phone calls to and
concerning the Convention Center. Unindicted Co-
Conspirator No. 1, posing as someone else, then called the
Convention Center's administrative line and falsely
reported that he left backpacks containing explosives in
the Convention Center and that they were set to explode.
Unindicted Co-Conspirator No. 1, again posing as someone

1 else, then called the Crime Stoppers tip line and
2 maliciously and falsely reported that he left backpacks
3 containing explosives in the Convention Center and that
4 they were set to explode. Defendant provided Unindicted
5 Co-Conspirator No. 1 with information about the evacuation
6 of the Convention Center in response to Unindicted Co-
7 Conspirator No. 1's false reports that he planted bombs
8 there. At all relevant times, Unindicted Co-Conspirator
9 No. 1 was located in the Central District of California and
10 the aforementioned communications involved the use of an
11 instrument of interstate and foreign commerce, namely the
12 Internet.

13
14 Moreover, beginning no later than November 27, 2017,
15 and continuing through December 5, 2017, defendant agreed
16 to, and did in fact, commit bank fraud. In furtherance of
17 this conspiracy, defendant committed, and caused others to
18 commit, the following overt acts:

19 On or before November 27, 2017, defendant opened an
20 account with a virtual private network service provider
21 (the "VPN Service"). On December 1, 2017, defendant
22 attempted to purchase a 1-month subscription to the VPN
23 Service with a credit card number that he knew belonged to
24 a real person and that he was not authorized to use.

25 On December 2, 2017, in Twitter direct messages,
26 Unindicted Co-Conspirator No. 1 asked defendant to purchase
27 a cap bearing a NASA logo (the "NASA cap") for Unindicted
28 Co-Conspirator No. 1. On December 3, 2017, in Twitter
Direct Messages, Unindicted Co-Conspirator No. 1 again
asked defendant to purchase the NASA cap for him.
Defendant agreed to make the purchase after obtaining
credit and debit card account numbers belonging to others
that he knew he was not authorized to use. Later that day,
and again on December 4, 2017, in Twitter direct messages
Unindicted Co-Conspirator No. 1 repeatedly insisted that
defendant purchase the NASA cap for him and provided
defendant with Unindicted Co-Conspirator No. 1's mailing
address in Los Angeles.

29 On December 4, 2017, defendant obtained a debit card
30 account number (the "Account Number"), which he knew
31 belonged to Victim J.B., which was linked to her checking
32 account at Waukesha State Bank, which at all relevant times
33 was a member of and insured insured by the Federal Deposit
34 Insurance Corporation. Later that day, defendant purchased
35 the NASA cap from an online retailer, using the
36 unauthorized Account Number. Defendant represented to the
37 online retailer that he was authorized to use the Account
38 Number to make the purchase when, in fact, he was not.
Defendant provided the online retailer with Unindicted Co-
Conspirator No. 1's name and address in Los Angeles for
shipping purposes. Unindicted Co-Conspirator No. 1 then
told defendant that he wanted him to purchase shoes for

1 him. On December 4, 2017, Defendant purchased a 1-month
2 subscription to the VPN Service, using the Account Number,
3 knowing that he was not authorized to use that Account
4 Number.

5 On December 5, 2017, in Twitter direct messages,
6 Unindicted Co-Conspirator No. 1 told defendant that he had
7 received the NASA cap and was thankful for it.

8 On December 6, 2017, in Twitter direct messages,
9 Unindicted Co-Conspirator No. 1 told defendant that he
10 wanted him to purchase shoes and a belt for him. He then
11 directed defendant to a website and asked him, "Can you
12 card it[?]," which was coded language indicating his intent
13 that defendant use an unauthorized credit or debit card
14 account number to make the purchase. Defendant responded,
15 "yessir."

16 As a consequence of defendant's unlawful conduct,
17 defendant owes restitution in the following amounts:
18 \$591.45 to the Milford Police Department; \$37.98 to Victim
19 J.B.; and \$33,078.69 to Victim A.B.

20 SENTENCING FACTORS

21 18. Defendant understands that in determining defendant's
22 sentence the Court is required to calculate the applicable Sentencing
23 Guidelines range and to consider that range, possible departures
24 under the Sentencing Guidelines, and the other sentencing factors set
25 forth in 18 U.S.C. § 3553(a). Defendant understands that the
26 Sentencing Guidelines are advisory only, that defendant cannot have
27 any expectation of receiving a sentence within the calculated
28 Sentencing Guidelines range, and that after considering the
29 Sentencing Guidelines and the other § 3553(a) factors, the Court will
30 be free to exercise its discretion to impose any sentence it finds
31 appropriate up to the maximum set by statute for the crime[s] of
32 conviction.

33 19. Defendant and the USAO agree to the following applicable
34 Sentencing Guidelines factors:

1 Base Offense Level: 12 U.S.S.G. § 2A6.1(a)(1)

2 Substantial Disruption +4 U.S.S.G. § 2A6.1(b)(4)

3 Defendant and the USAO reserve the right to argue that additional
4 specific offense characteristics, adjustments, and departures under
5 the Sentencing Guidelines are appropriate.

6 20. Defendant understands that there is no agreement as to
7 defendant's criminal history or criminal history category.

8 21. Defendant and the USAO reserve the right to argue for a
9 sentence outside the sentencing range established by the Sentencing
10 Guidelines based on the factors set forth in 18 U.S.C. § 3553(a)(1),
11 (a)(2), (a)(3), (a)(6), and (a)(7).

12 WAIVER OF CONSTITUTIONAL RIGHTS

13 22. Defendant understands that by pleading guilty, defendant
14 gives up the following rights:

15 a. The right to persist in a plea of not guilty.

16 b. The right to a speedy and public trial by jury.

17 c. The right to be represented by counsel -- and if
18 necessary have the Court appoint counsel -- at trial. Defendant
19 understands, however, that, defendant retains the right to be
20 represented by counsel -- and if necessary have the Court appoint
21 counsel -- at every other stage of the proceeding.

22 d. The right to be presumed innocent and to have the
23 burden of proof placed on the government to prove defendant guilty
24 beyond a reasonable doubt.

25 e. The right to confront and cross-examine witnesses
26 against defendant.

1 f. The right to testify and to present evidence in
2 opposition to the charges, including the right to compel the
3 attendance of witnesses to testify.

4 g. The right not to be compelled to testify, and, if
5 defendant chose not to testify or present evidence, to have that
6 choice not be used against defendant.

7 h. Any and all rights to pursue any affirmative defenses,
8 Fourth Amendment or Fifth Amendment claims, and other pretrial
9 motions that have been filed or could be filed.

10 WAIVER OF APPEAL OF CONVICTION

11 23. Defendant understands that, with the exception of an appeal
12 based on a claim that defendant's guilty pleas were involuntary, by
13 pleading guilty defendant is waiving and giving up any right to
14 appeal defendant's convictions on the offenses to which defendant is
15 pleading guilty. Defendant understands that this waiver includes,
16 but is not limited to, arguments that the statutes to which defendant
17 is pleading guilty are unconstitutional, and any and all claims that
18 the statement of facts provided herein is insufficient to support
19 defendant's pleas of guilty.

20 LIMITED MUTUAL WAIVER OF APPEAL OF SENTENCE

21 24. Defendant agrees that, provided the Court imposes a total
22 term of imprisonment on all counts of conviction of no more than
23 eighteen months, defendant gives up the right to appeal all of the
24 following: (a) the procedures and calculations used to determine and
25 impose any portion of the sentence; (b) the term of imprisonment
26 imposed by the Court; (c) the fine imposed by the Court, provided it
27 is within the statutory maximum; (d) to the extent permitted by law,
28 the constitutionality or legality of defendant's sentence, provided

1 it is within the statutory maximum; (e) the amount and terms of any
2 restitution order, provided it requires payment of no more than
3 \$33,708.12; (f) the term of probation or supervised release imposed
4 by the Court, provided it is within the statutory maximum; and
5 (g) any of the following conditions of probation or supervised
6 release imposed by the Court: the conditions set forth in General
7 Order 18-10 of this Court; the drug testing conditions mandated by 18
8 U.S.C. §§ 3563(a)(5) and 3583(d); and the alcohol and drug use
9 conditions authorized by 18 U.S.C. § 3563(b)(7).

10 25. The USAO agrees that, provided (a) all portions of the
11 sentence are at or below the statutory maximum specified above and
12 (b) the Court imposes a sentence of no less than three years'
13 probation, the USAO gives up its right to appeal any portion of the
14 sentence, with the exception that the USAO reserves the right to
15 appeal the following: (a) the amount of restitution ordered if that
16 amount is less than \$33,708.12.

17 RESULT OF WITHDRAWAL OF GUILTY PLEA

18 26. Defendant agrees that if, after entering guilty pleas
19 pursuant to this agreement, defendant seeks to withdraw and succeeds
20 in withdrawing defendant's guilty pleas on any basis other than a
21 claim and finding that entry into this plea agreement was
22 involuntary, then the USAO will be relieved of all of its obligations
23 under this agreement.

24 EFFECTIVE DATE OF AGREEMENT

25 27. This agreement is effective upon signature and execution of
26 all required certifications by defendant, defendant's counsel, and an
27 Assistant United States Attorney.

1 Court's Sentencing Guidelines calculations and the sentence it
2 chooses to impose are not error, although each party agrees to
3 maintain its view that the calculations in paragraph 19 are
4 consistent with the facts of this case. While this paragraph permits
5 both the USAO and defendant to submit full and complete factual
6 information to the United States Probation and Pretrial Services
7 Office and the Court, even if that factual information may be viewed
8 as inconsistent with the facts agreed to in this agreement, this
9 paragraph does not affect defendant's and the USAO's obligations not
10 to contest the facts agreed to in this agreement.

11 31. Defendant understands that even if the Court ignores any
12 sentencing recommendation, finds facts or reaches conclusions
13 different from those agreed to, and/or imposes any sentence up to the
14 maximum established by statute, defendant cannot, for that reason,
15 withdraw defendant's guilty pleas, and defendant will remain bound to
16 fulfill all defendant's obligations under this agreement. Defendant
17 understands that no one -- not the prosecutor, defendant's attorney,
18 or the Court -- can make a binding prediction or promise regarding
19 the sentence defendant will receive, except that it will be within
20 the statutory maximum.

21 NO ADDITIONAL AGREEMENTS

22 32. Defendant understands that, except as set forth herein,
23 there are no promises, understandings, or agreements between the USAO
24 and defendant or defendant's attorney, and that no additional
25 promise, understanding, or agreement may be entered into unless in a
26 writing signed by all parties or on the record in court.

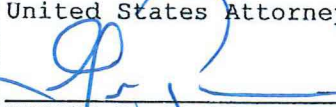
PLEA AGREEMENT PART OF THE GUILTY PLEA HEARING

33. The parties agree that this agreement will be considered part of the record of defendant's guilty plea hearing as if the entire agreement had been read into the record of the proceeding.

AGREED AND ACCEPTED


UNITED STATES ATTORNEY'S OFFICE
FOR THE CENTRAL DISTRICT OF
CALIFORNIA

NICOLA T. HANNA
United States Attorney




GEORGE E. PENCE
Assistant United States Attorney

7/22/19
Date



NEAL PATEL
Defendant

06/25/19
Date



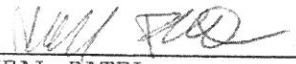
STEPHEN DEMIK
Attorney for Defendant NEAL PATEL

6/28/19
Date

CERTIFICATION OF DEFENDANT

I have read this agreement in its entirety. I have had enough time to review and consider this agreement, and I have carefully and thoroughly discussed every part of it with my attorney. I understand the terms of this agreement, and I voluntarily agree to those terms. I have discussed the evidence with my attorney, and my attorney has advised me of my rights, of possible pretrial motions that might be filed, of possible defenses that might be asserted either prior to or at trial, of the sentencing factors set forth in 18 U.S.C. § 3553(a), of relevant Sentencing Guidelines provisions, and of the consequences of entering into this agreement. No promises, inducements, or

1 representations of any kind have been made to me other than those
2 contained in this agreement. No one has threatened or forced me in
3 any way to enter into this agreement. I am satisfied with the
4 representation of my attorney in this matter, and I am pleading
5 guilty because I am guilty of the charges and wish to take advantage
6 of the promises set forth in this agreement, and not for any other
7 reason.


8 
9 NEAL PATEL
Defendant

06/25/19
Date

10
11
12
13
14 CERTIFICATION OF DEFENDANT'S ATTORNEY

15 I am NEAL PATEL's attorney. I have carefully and thoroughly
16 discussed every part of this agreement with my client. Further, I
17 have fully advised my client of his rights, of possible pretrial
18 motions that might be filed, of possible defenses that might be
19 asserted either prior to or at trial, of the sentencing factors set
20 forth in 18 U.S.C. § 3553(a), of relevant Sentencing Guidelines
21 provisions, and of the consequences of entering into this agreement.
22 To my knowledge: no promises, inducements, or representations of any
23 kind have been made to my client other than those contained in this
24 agreement; no one has threatened or forced my client in any way to
25 enter into this agreement; my client's decision to enter into this
26 agreement is an informed and voluntary one; and the factual basis set
27
28

1 forth in this agreement is sufficient to support my client's entry of
2 guilty pleas pursuant to this agreement.

3 
4 STEPHEN DEMIK
5 Attorney for Defendant NEAL PATEL

6/28/19
Date